

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

(1) JAMMIE SARTIN,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 15-CV-0686-TCK-TLW
)	
(1) OKLAHOMA DEPARTMENT OF)	
HUMAN SERVICES; and,)	
(2) JOHN DOES 1-30, unknown individuals)	
Employed by OKLAHOMA DEPARTMENT,)	
OF HUMAN SERVICES,)	
)	
Defendants.)	

NOTICE OF REMOVAL

1. The Oklahoma Department of Human Services (“OKDHS”) is a defendant in a civil action brought against it in the District Court of Ottawa County, State of Oklahoma, and titled Jammie Sartin v. Oklahoma Department of Human Services, et al., Case No. CJ-2015-132 (Ottawa County District Court).

2. At the time of filing this action and at the present time, the Plaintiff was and is seeking recovery in this case against Defendant OKDHS for alleged violations of the Family and Medical Leave Act (“FMLA”), 29 USC §2601, et seq., and the Americans with Disabilities Act (“ADA”), 42 U.S.C. §12101, seq., (with pendent state claims).

3. This is the kind of action of which the United States District Courts have original jurisdiction pursuant to 28 U.S.C. §1331 (and the jurisdictional provisions of the FMLA and ADA) because the Plaintiff’s claims arise under the Constitution, laws or treaties of the United States, including the FMLA and the ADA.

4. The aforementioned action was commenced on November 3, 2015, and service of summons in the case was then made upon Defendant OKDHS on November

6, 2015. Therefore this Notice of Removal is timely filed by Defendant OKDHS under the provisions of 28 U.S.C. §1446.

5. Copies of all process, pleadings and orders served upon Defendant OKDHS or filed in the aforementioned state action (and a copy of the state court's docket sheet in that case) are attached hereto as Exhibits 1 through 4 and made a part hereof.

Respectfully submitted,

s/RICHARD W. FREEMAN, JR.

Richard W. Freeman, Jr. (OBA #3130)

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Attorney for Defendant Oklahoma

Department of Human Services.

CERTIFICATE OF SERVICE

I certify that on the same date this Notice of Removal was filed in the United States District Court for the Northern District of Oklahoma that a true and correct copy of said Notice of Removal was served upon the above named Plaintiff by mailing said copy to Plaintiff's attorney of record and that a copy of said Notice of Removal was mailed to said Court Clerk of Ottawa County, Oklahoma, for filing this 7th day of December, 2015, and to the following attorneys of record:

Tony Mareshie
E. ANTHONY MARESHIE, PLLC
P. O. Box 330161
Tulsa, OK 74133-0161

Attorney for Plaintiff.

s/RICHARD W. FREEMAN, JR.
Richard W. Freeman, Jr.